

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

SONYA CONCHITA MURILLO,

Defendant.

4:23-cr-279

INDICTMENT

**Counts 1-4: 18 U.S.C. § 2251(a) Production
of Child Pornography**

**Count 5: 18 U.S.C. § 2252A(a)(2),
Distribution of Child Pornography**

**GOVERNMENT'S NOTICE DEMAND
OF FORFEITURE**

THE GRAND JURY CHARGES:

**COUNT ONE
[18 U.S.C. § 2251(a)]**

From on or about January 1, 2017, to on or about December 31, 2017, in the Western District of Texas, the Defendant,

SONYA CONCHITA MURILLO,

did knowingly employ, use, persuade, induce, entice and coerce, a minor, CV1, to engage in sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, to wit, the White 1 series, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, and the visual depiction was transported using any means and facility of interstate and foreign commerce, and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2251(a).

COUNT TWO
[18 U.S.C. § 2251(a)]

From on or about January 1, 2017, to on or about December 31, 2017, in the Western District of Texas, the Defendant,

SONYA CONCHITA MURILLO,

did knowingly employ, use, persuade, induce, entice and coerce, a minor, CV1, to engage in sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, to wit, the White 2 series, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, and the visual depiction was transported using any means and facility of interstate and foreign commerce, and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2251(a).

COUNT THREE
[18 U.S.C. § 2251(a)]

From on or about January 1, 2017, to on or about December 31, 2017, in the Western District of Texas, the Defendant,

SONYA CONCHITA MURILLO,

did knowingly employ, use, persuade, induce, entice and coerce, a minor, CV1, to engage in sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, to wit, the Minion series, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, and the visual depiction was transported using any means and facility of interstate and foreign commerce, and the visual depiction was produced using materials that have been mailed, shipped, and transported

in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2251(a).

COUNT FOUR
[18 U.S.C. § 2251(a)]

From on or about January 1, 2017, to on or about December 31, 2017, in the Western District of Texas, the Defendant,

SONYA CONCHITA MURILLO,

did knowingly employ, use, persuade, induce, entice and coerce, a minor, CV1, to engage in sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, to wit, the Green series, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, and the visual depiction was transported using any means and facility of interstate and foreign commerce, and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2251(a).

COUNT FIVE
[18 U.S.C. § 2252A(a)(2)]

From on or about January 1, 2017, to on or about December 31, 2017, in the Western District of Texas, Defendant,

SONYA CONCHITA MURILLO,

did knowingly distribute child pornography as defined in Title 18, United States Code, Section 2256(8)(A) using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(2).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Sexual Exploitation of Children Violations and Forfeiture Statutes

[Title 18 U.S.C. §§ 2251 (a) and (e), 2252(a) and (e) and 2252A(a)(2), subject to forfeiture pursuant to Title 18 U.S.C. § U.S.C. 2253(a)(a), (2) and (3)]

As a result of the criminal violation set forth in Counts One and Two, the United States gives notice to the Defendant of its intent to seek the forfeiture of property, upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 2253(a)(1), (2), and (3), which states:

Title 18 U.S.C. § 2253. Criminal forfeiture

(a) Property subject to criminal forfeiture.-A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2251B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in-

- (1)** any visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2)** any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3)** any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

The Notice of Demand for Forfeiture includes but is not limited to the property described below in Paragraph II.

II.

Property

1. Any and all other property and/or accessories involved in or used in the commission of the criminal offense; and

2. Any and all other property involving any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260.

A TRUE BILL. 



FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY:



KEVIN R. CAYTON

 ASSISTANT UNITED STATES ATTORNEY